Honolulu High Capacity ADEIS Barr's Comments 10/24/08

I have no further comments on Executive Summary or the Chapter 5 (Dillingham Building) submittals.

Comments on the Abstract

The <u>Abstract shall contain the following language</u> as a stand-alone paragraph and is not subject to HTS alteration:

"FTA is interested in, and requests public comment on the issues of project phasing and logical termini:

- Three of the four goals and objectives of this project are to improve transportation equity, improve corridor mobility and improve corridor travel reliability. FTA requests public comment on the High-Capacity project phasing, and whether project phasing best addresses project goals and objectives.
- Phase I of the project will contain fewer than one-half dozen activity centers. FTA requests public comment on the location of the East Kapoeli Station and whether this is a logical terminus."

Comments on Preface

I support the Preface presented in the original ADEIS, August 1, 2008. If HTS wants to use the Preface delivered 10/23 in the DEIS, they are welcome to do that. However, using the 10/23 Preface in the final DEIS shall not preclude the use of the two bullet points above in the Abstract.

Comments on Chapter 4

My only concern is that no maps of the M&S facilities are included. Aerials showing associated land uses should be included. The maps should be of a size that accurately displays the neighboring land uses, or in the case of the proposed Ho'opili location, future land uses.

Sent to HTS 10/14

In order to clarify: a rail M&S facility typically represents a major impact on the surrounding are in which it is located and ordinarily requires a subsection of its own in the NEPA document. The subsection in the DEIS should include discussions of all probable impacts and an appropriate menu of mitigation measures. *High resolution maps should be included*. In the case where M&S alternatives are under consideration, all the more reason to discuss environmental impacts and mitigation measures in parallel. Please consolidate this discussion and *provide reader-friendly maps*. (Emphasis added)

Comments on Chapter 7

Comment 93

p.7.9

add language

The cost-effectiveness indices for the Build Alternatives compared to the baseline fall

within the "medium" range established by FTA for its New Starts ratings, which, along with other considerations, is currently required to qualify for New Starts funding. FTA is currently reviewing the estimates made for the operating and maintenance costs, and capital costs, travel forecasting and user benefits for the Build Alternatives. If these results hold up through subsequent phases of project development, along with other FTA considerations...

Comment 94

Regarding table and graphic footnote:

HTS response to comment:

"Per phone discussion, FTA has reviewed, and may soon approve the ridership data. See response to item 93 above."

This statement by HTS staff is inaccurate and misleading. Per the FTA/HTS phone conversation, HTS agreed to provide the following footnote below <u>all</u> appropriate tables and graphics: "Data currently under review by FTA."

This is a public information document. It is also an FTA document. FTA endeavors to present the best and most up-to-date information available to the public. We believe that the data presented in Chapter 7 is the best available and most up-to-date data. However, when data have not been reviewed or approved by FTA then a caveat is required.

HTS should add the following footnote to Table 7-2 (p.7-3), Table 7-3 (p.7-4), Table 7-6 (p. 7-7), Table 7-7 (p. 7-9), Table 7-9 (p. 7-11) and Figure 7-1 (p. 7-6): "Data currently under review by FTA."

If HTS has not agreed to this change by COB PST, TRO-8 should consider adding the following language to the DEIS cover Letter:

"FTA is currently reviewing the estimates made for the operating and maintenance costs, capital costs, travel forecasting and user benefits for the TSM and Build Alternatives. Data on these costs and benefits presented in the DEIS are the best available at this time and are solely derived from HTS estimates."